



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street Phoenix, Arizona 85007
(602) 771-2300 www.azdeq.gov



Small MS4 Annual Report

ID #: AZSM65737

MS4 Name: CITY OF COTTONWOOD MS4

Reporting Period: 01-Jul-2018 To 30-Jun-2019

Main Office

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Southern Regional Office

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Annual Report Summary

Company Information

Name : CITY OF COTTONWOOD

827 N MAIN ST

COTTONWOOD

AZ , 86326

Question: During this reporting period, was additional land annexed into the regulated MS4 area?

Answer: No

Question: Is stormwater sewer mapping 100 percent complete?

Answer: Yes

Provide the description of the measurable goal:

The City's Stormdrain Mapping inventory was completed in 2017. This map is available in CAD format.

Question: Is outfall mapping 100 percent complete?

Answer: Yes

Number of outfalls mapped: 6

Provide the description of the measurable goal:

We added a new monitoring point this fiscal year as a result of our audit with ADEQ in June 2019. The new monitoring point added is in the "Old Town" Cottonwood area and is referenced by following Lat/Long coordinates: Lat: 34deg44'58.44"N / Long: 112deg1'38.74"W.

We also relocated one outfall monitoring location during this period along Oak Wash. The updated monitoring point location is referenced by the following Lat/Long coordinates: Lat: 34deg43'13.14"N / Long: 112deg0'1.71"W.

Question: Is identification of receiving waters information 100 percent complete?

Answer: Yes

Provide the description of the measurable goal:

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The receiving waters of the City's storm drainage system is the Verde River. we have identified two direct outfall locations that drain directly to the river otherwise, the remaining outfalls discharge to another permitted agency. One of the identified outfalls is Del Monte Wash which has not been observed to receive significant flows to convey runoff directly to the Verde River. The second outfall identified is Santa Cruz Wash which has been added as the City's stormwater sampling point since it conveys runoff from the City's commercial corridor to the Verde River.

Question: Has an Illicit Discharge Detection and Elimination (IDDE) enforcement authority or other regulatory mechanism been established?

Answer: Yes

Name	Title/Code/Citation	Effective Date	Inactive Date
Cottonwood Municipal Code	15.40	09/30/2018	

Question: Has a Construction Site Stormwater Runoff enforcement authority or other regulatory mechanism been established?

Answer: Yes

Name	Title/Code/Citation	Effective Date	Inactive Date
Cottonwood Municipal Code	15.44	09/30/2018	

Question: Has a Post-Construction Stormwater Management enforcement authority or other regulatory mechanism been established?

Answer: Yes

Name	Title/Code/Citation	Effective Date	Inactive Date
Cottonwood Municipal Code	15.44	09/30/2018	

Question: For each BMP in the Minimum Control Measure 1: Public Education and Outreach, what was completed during this reporting period?

Answer:

BMP Name: 1-1 Utility Bill Insert

Category: Utility Bill Insert

Personnel Position/Department: Utility Department

BMP Description :

The City will distribute information to residents using utility bill inserts and educate the public on storm-water related issues.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Targeted Audience: Utility Customers **Frequency:** 1 Two times per year

Milestone Description:

The City reports the number of stormwater related inserts distributed with utility bills during each reporting period. (Inserts are distributed 2 times per year minimum.)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

A note regarding stormwater was inserted into utility customer's water bills and the City received zero feedback on either the City's Stormwater Hotline or the Stormwater email address. This method of distribution has been determined to be ineffective.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

We have changed our primary method for public outreach because we have found that we are getting zero responses to the existing methods employed or the distribution of stormwater related information. As a result of this lack of feedback, the City initiated a new public education and outreach program in June 2019 through the City's Facebook page. This new campaign consists of posting newly developed stormwater fact sheets aimed to increase public awareness of the issues with stormwater runoff. This new approach allows us to track how many Likes/Shares/views we get for each distribution. The first item released through this avenue was released on June 2019.

BMP Name: 1-4 Fact Sheets

Category: Fact Sheets

Personnel Position/Department: Utility Department

BMP Description :

The City will distribute fact sheets for business owners regarding stormwater at local meetings and events and will be made available on the website.

Is another government entity responsible for this BMP ? No

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Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Targeted Audience: Business owners **Frequency:** 1 Two times per year

Milestone Description:

Document number of fact sheets distributed to business owners each year. (Distribute materials at a minimum of 2 events per year.)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

A total of 50 +/- brochures were distributed to elementary school children and residents at various school outreach sessions conducted throughout the year and at Verde River Days 2018.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

We have changed our primary method for public outreach because we have found that we are getting zero responses to the existing methods of distributing information. During June 2019 we began posting stormwater fact sheets to increase public awareness through the City's Facebook page. This new approach allows us to track how many Likes/Shares/views we get for each distribution. The first item released through this avenue on June

BMP Name: 1-3 Printed Materials

Category: Printed Materials

Personnel Position/Department: Public Works

BMP Description :

The City will distribute printed materials geared towards the general public regarding stormwater at local meetings and events and will be made available on the website.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Targeted Audience: General Public **Frequency:** 1 Two times per year

Milestone Description:

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Record number of materials distributed. (Distribute materials at a minimum of 2 events per year.)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City keeps stacks of printed stormwater brochures at the majority of its public facilities that receive customers for service related measures. The primary locations are the Public Works offices, the Library, the Community Development offices, and the Riverfront Water Reclamation Facility.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City will continue to provide printed stormwater brochures at the public facilities identified above. The City is working on developing an updated general stormwater brochure.

BMP Name: 1-2 Webpage

Category: Webpage

Personnel Position/Department: Public Works

BMP Description :

The City will maintain and update the storm-water webpage with the most current SWMP and other applicable stormwater information.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Targeted Audience: General public **Frequency:** 1 Daily

Milestone Description:

The City will record the dates the site is updated and the number of visitors to the site each reporting period. (Website is available year-round.)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The number of hits to the webpage were ____.

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Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City will consider relocating the placement of the stormwater webpage so that it is more easily found without being as deeply as it currently is.

Question: Minimum Control Measure 1: Public Education and Outreach, Did the program implement any additional BMPs during this reporting period?

Answer:

Did the program implement any additional BMPs during this reporting period? Yes

BMP Name: Public Works Monthly Inspection

Provide a description of the BMP, include reason(s) for implementing the BMP, its effectiveness, frequency, and goal:

The goal of the Public Works monthly inspection program is to collect trash and observe any illicit discharges on and/or leaving the yard.

Will this BMP be used for future reporting periods? Yes

Please add this BMP to the NOI to have it auto-populate in future annual reports

Provide a summary of compliance with the requirements for Minimum Control Measure1.

The City implemented a monthly site inspection program of the Public Works yard in June 2019 following the ADEQ Audit. This inspection is being utilized to collect trash and observe site conditions related to erosion and other illicit discharges.

Question: For each BMP in the Minimum Control Measure 2: Public Involvement and Participation, what was completed during this reporting period?

Answer:

BMP Name: 2-3 Procedure for Receiving Public Comment

Category: Procedure for Receiving Public Comment

Personnel Position/Department: Public Works

BMP Description :

The City will provide the public with an opportunity to report storm-water violations. Residents can call a hotline, or submit complaints via email.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

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Milestone Description:

City will record the number of complaints received and the resolution reached for each complaint. (Annually)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City received zero calls to its Stormwater Hotline during this reporting period. Additionally, there were zero emails received on the City's stormwater email address for this reporting period.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

Our current social media campaign includes the Stormwater Hotline number and stormwater email address on every document released. We have included some stormwater related #hashtags, but haven't developed a Twitter feed to respond to them yet. We will explore this option further during the next reporting period.

BMP Name: 2-2 Adopt-a-Street Program

Category: Public Participation

Personnel Position/Department: Streets Division

BMP Description :

The City will implement and solicit an Adopt-A-Street Program where residents can directly participate in the reduction of pollutants that may impact stormwater quality.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

City will report the number of clean-up events, number of participants, and the pounds of trash removed during the reporting period. (Annually)

Were milestones/measurable goals achieved for this reporting period? No

ADEQ Directed No

Change:

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Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.

The City has experienced a lack of participation from registered organizations participating in its Adopt-A-Street Program over the past few years. The City decided that it would be a good time to revamp our existing Adopt-A-Street program and this wasn't finalized until September 2019 and we are currently preparing to begin advertising the new program by late October 2019.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City hopes to roll out the newly revamped Adopt-A-Street Program during the last 1st Quarter or early 2nd Quartey of the next reporting period.

BMP Name: 2-1 Implement Public Notice

Category: Public Involvement

Personnel Position/Department: Public Works

BMP Description :

The City will provide the most current SWMP and NOI on their webpage and solicit public feedback through the stormwater hotline.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 One time event

Milestone Description:

City will record the feedback received from residents. (Once per permit term)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The current documents are posted to the City's stormwater webpage and the City received no feedback on them through either the Stormwater Hotline or stormwater email address during this reporting period.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

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The City will provide any updates to the existing policies on its website and track any comments received.

Question: For Minimum Control Measure 2: Public Involvement and Participation, Did the program implement any additional BMPs during this reporting period?

Answer:

Did the program implement any additional BMPs during this reporting period? Yes

BMP Name: Public Outreach Campaign (2019)

Provide a description of the BMP, include reason(s) for implementing the BMP, its effectiveness, frequency, and goal:

The City embarked on a new Public Outreach Campaign during the previous reporting period through social media. The goal is to increase awareness of the program and what constitutes a violation as well as to solicit feedback through a previously unexplored media type.

Will this BMP be used for future reporting periods? Yes

Please add this BMP to the NOI to have it auto-populate in future annual reports

Provide a summary of compliance with the requirements for Minimum Control Measure 2.

Receiving feedback from the public has been and continues to be a difficult task for us. It seems like we need to work on a new way to get the message out and the current hope is through social media.

Question: For each BMP in the Minimum Control Measure 3: Illicit Discharge Detection and Elimination Program, what was completed during this reporting period?

Answer:

BMP Name: 3-3 Dry Weather Screening

Category: Dry Weather Screening

Personnel Position/Department: Public works

BMP Description :

Inspect outfalls and/or screening points during dry periods to identify potential illicit discharges.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Record number of dry weather screenings performed each year. (20% of City's MS4 will be inspected annually.)

Were milestones/measurable goals achieved for this reporting period? Yes

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Actual BMP Start 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

Staff continues to regularly monitor all approved outfalls for both dry and wet weather discharges. During this reporting period, there were no observed issues during the dry weather screenings conducted.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City will continue to monitor all of its approved outfalls for dry weather monitoring.

BMP Name: 3-5 Follow-Up Screening Procedures

Category: Follow-Up Screening Procedures

Personnel Position/Department: Public Works

BMP Description :

Eliminated ID's will be inspected to ensure they have been.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 10/01/2017

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Locations of original IDs shall be revisited to ensure they are still in compliance. (ID sites revisited within 1 year of discovery.)

Were milestones/measurable goals achieved for this reporting period? No

ADEQ Directed No

Change:

Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.

The City first identified IDDEs during the ADEQ MS4 audit. Upon the initial inspection, cleanup efforts were made, but the 1-year time period has not passed for these identified violations.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

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The City will conduct periodic inspections throughout the year and make a final report at the close of the 1-year period.

BMP Name: 3-6 Unpermitted Discharges

Category: Unpermitted Discharges

Personnel Position/Department: Public Works

BMP Description :

Check permits of businesses and active construction sites in order to identify potentially unpermitted facilities and non-filers.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

City will audit 100% of active construction sites and 20% of new businesses each year. City will contact potential non-filers and notify ADEQ annually.

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City has begun having individual developments obtain NOIs during this reporting period. City staff conducts periodic inspections to verify that BMPs have been implemented and are kept up.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City will continue to perform these duties annually.

BMP Name: 3-1 Enforcement Procedures

Category: Enforcement Procedures

Personnel Position/Department: Code Enforcement

BMP Description :

Code Enforcement Officers to enforce illicit discharges using ERP.

Is another government entity responsible for this BMP ? No

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Measurable Goals:

Start Date: 10/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Update ERP procedures as necessary. Record number of enforcement actions each year. (Ongoing enforcement of all illicit discharges.)

Were milestones/measurable goals achieved for this reporting period? No

ADEQ Directed No

Change:

Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.

The City is currently drafting a new ordinance to give more tooth to its enforcement options. This ordinance is currently in DRAFT format waiting for review by the City Attorney. It is anticipated that the new ordinance will be approved during the 2nd Quarter of the next reporting period.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

Once the new ordinance becomes effective, staff will be able to better enforce stormwater violations through the City's Municipal Code.

BMP Name: 3-4 Wet Weather Monitoring

Category: Wet Weather Monitoring

Personnel Position/Department: Public Works

BMP Description :

Visually monitor outfalls and/or screening points in response to a rain event to identify potential illicit discharges.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Two times per year

Milestone Description:

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Record number of wet weather visual monitoring inspections performed each year. (2 per wet season per year for each outfall or screening point.)

Were milestones/measurable goals achieved for this reporting period?

Actual BMP Start 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City continues to monitor its approved outfalls during wet and dry weather. This reporting period was difficult due to an unusually dry monsoon season that resulted in less than the required wet weather reporting event. We will continue to monitor outfalls for concentrated runoff in measurable quantity so that the required sampling can be obtained.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The Utilities Dept. will provide stormwater sample collection and analysis for this permit requirement. As a precursor to next year's annual report, we were able to collect our first two samples on September 23rd & September 26th.

BMP Name: 3-7 Employee Training

Category: Staff Training

Personnel Position/Department: Public Works

BMP Description :

Yearly training of staff on IDDE procedures.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

City will record number of employees who received stormwater training each year. (Training occurs annually.)

Were milestones/measurable goals achieved for this reporting period?

Actual BMP Start 12/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

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In December 2018 three of the City's engineering staff completed the NPDES Certified Stormwater Inspector training course. Since June 2019, the City has begun monthly training for staff responsible for monitoring stormwater runoff. These trainings include webinars and Youtube videos on pertinent stormwater topics.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The monthly stormwater trainings will be continued into the future.

BMP Name: 3-2 Eliminate Illicit Discharges

Category: Eliminate Illicit Discharges

Personnel Position/Department: Public Works

BMP Description :

IDs will be addressed and eliminated.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 One time event

Milestone Description:

City will record number of IDs eliminated during each reporting period. (IDs will be eliminated per IDDE SOP.)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 06/15/2019

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

City staff identified and illicit discharge consisting of a garden hose hanging out of a fence drain block. City staff revisited the address and the illicit discharge was eliminated by the property owner.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

City staff will continue to actively seek out illicit discharges and work to eliminate them.

BMP Name: 3-9 Written IDDE Procedures

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Category: Written IDDE Procedures

Personnel Position/Department: Public Works

BMP Description :

Written IDDE Procedures: Develop a SOP to identify, report and resolve IDDE's.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Written IDDE Procedures: Develop a written Policy Document for internal use.

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 06/15/2019

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City has developed a written SOP for IDDEs.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

City staff will utilize the SOP written for IDDEs within our jurisdiction.

BMP Name: 3-8 Implement IDDE Program

Category: Implement IDDE Program

Personnel Position/Department: Public Works

BMP Description :

Implement IDDE Program: Develop a SOP to identify and report IDDEs.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Implement IDDE Program: Track IDDE's reported int eh MS4Front software.

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Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 06/15/2019

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

City staff has received training on identifying and detecting illicit discharges and has been instructed to actively pursue their existence and removal. At the June ADEQ field visit portion of the audit, an illicit discharge was identified on Camino Real. Staff went back and investigated the incident and it had been corrected prior to their arrival.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

City staff will continue to actively seek out illicit discharges and work to correct their existence.

Question: For Minimum Control Measure 3: Illicit Discharge Detection and Elimination Program, Did the program implement any additional BMPs during this reporting period?

Answer:

Did the program implement any additional BMPs during this reporting period? No

Provide a summary of compliance with the requirements for Minimum Control Measure 3.

The IDDE program is difficult to implement with the City's existing staffing levels. The City's inspection staff will be routinely trained to detect IDDEs to ensure they are kept up to speed on these requirements of the permit.

Question: Were staff trained in IDDE Awareness and Response?

Answer:

Yes

Sr.No.	Date of Training Event	Training Subject	Number of Employees Trained	Frequency of Training
1	12/18/2018	Stormwater Inspector Training	3	Annually

Question: Minimum Control Measure 1: Illicit Discharge Detection and Elimination Program, Provide the details of the Illicit Discharge Detection and Elimination (IDDE) incidents that occurred during this reporting period.

Answer:

Number of IDDE incidents reported in this reporting period: 4

Number of IDDE incidents responded to in this reporting period: 4

Sr.No.	Enforcement Actions	Enforcements Issued	Enforcements Resolved	Enforcements Unresolved
1	NOV	4	4	0
2	NOC	0	0	0
3	Stop Work	0	0	0
4	Admin Order	0	0	0
5	Admin Fines	0	0	0
6	Civil Penalties	0	0	0
7	Criminal Action	0	0	0
	Total	4	4	0

Question: Were there any unpermitted discharges to the MS4?

Answer: No

Question: Were any samples collected to characterize illicit discharge(s) in this reporting period?

Answer: No

Number of Illicit Discharges Sampled are:

The illicit discharges identified were found during dry weather periods when there was no visible liquid present at the time of inspection.

Question: For each BMP in the Minimum Control Measure 4: Construction Activity Stormwater Runoff Control, what was completed during this reporting period?

Answer:

BMP Name: 4-1 Construction Inventory

Category: Inventory

Personnel Position/Department: Community Development

BMP Description :

Keep database of active construction projects.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

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Frequency: 1 Annually

Milestone Description:

Number of active construction sites will be recorded for each reporting period. (Database updates performed as needed.)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

This BMP makes it easy to identify where the active construction sites are within the City.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City will continue to maintain an updated database of current/active construction sites.

BMP Name: 4-7 Control Wastes

Category: Control Wastes

Personnel Position/Department: Public Works

BMP Description :

Control Wastes generated onsite with good housekeeping practices.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Control Wastes: Perform monthly site inspections to observe the effectiveness of the good housekeeping practices.

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

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City staff makes sure that they are vigilant in promptly picking up spills by using kitty litter to absorb the spill and collecting and disposing of it via the trash. Staff additionally conducts monthly inspections of the Public Works yard to make sure that trash and other debris is removed from the site.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

City staff will continue to conduct activities as it has been doing.

BMP Name: 4-3 Construction Site Inspection and Enforcement Procedures

Category: Inspections

Personnel Position/Department: Public Works

BMP Description :

Inspect construction projects for stormwater compliance.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Record number of inspections each year. (All construction sites will receive 1 inspection minimum.)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City's Utilities and Public Works Inspectors routinely inspect active construction sites for compliance of stormwater requirements. We found that training in certain areas was lacking and that staff needed more experience with certain aspects of the program. Monthly training has been instituted with varying topics to provide greater exposure to what is actually covered under this permit.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

Monthly training has been instituted with varying topics to provide greater exposure to what is actually covered under this permit. The City would like to develop some mock field setups of SWPP countermeasures to train employees on proper installation and general exposure.

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BMP Name: 4-4 Contractor Education

Category: Construction Operator Training

Personnel Position/Department: Public Works

BMP Description :

Contractor education program and onsite training.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Document and record trainings each year. (All contractors to receive storm-water compliance information.)

Were milestones/measurable goals achieved for this reporting period? No

ADEQ Directed No

Change:

Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.

The City is currently developing a new public outreach program that is focused on all aspects of the Stormwater program. We will look to roll out a formal training class for contractors during the next reporting period.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City will look to host a Construction Site Runoff Training course for local contractors to attend and participate in during this next reporting period.

BMP Name: 4-5 Employee Training

Category: Employee Training

Personnel Position/Department: Public Works

BMP Description :

The City will conduct an annual stormwater training for all employees which will include inspection activities.

Is another government entity responsible for this BMP ? No

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Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Record the number of employees trained during each reporting period. (All employees trained 1 time per year.)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City had three members of staff attend the NPDES Certified Stormwater Inspector training course. This course covers all general aspects of the MS4 program.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City has instituted monthly stormwater training for its Public Works staff. This will continue into the next reporting period. The City will also develop a generic training course to have all City employees participate in to raise general awareness of the MS4 program.

BMP Name: 4-6 Erosion/ Sediment Control

Category: Erosion/ Sediment Control

Personnel Position/Department: Public Works

BMP Description :

Erosion/ Sediment Control: Implement and/or maintain berms or vegetative buffers along the perimeter of the Public Works Yard to prevent runoff.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Erosion/ Sediment Control: Perform annual inspection and repair of damaged implements.

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Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 06/15/2019

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City implemented a monthly inspection program where staff conducts a sweep of the Public Works yard to look for erosion and sediment transportation as well as collect trash from the site. This will be continued into the next reporting period.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City will continue its monthly inspections of the Public Works Yard.

BMP Name: 4-2 Review Construction Plans

Category: Site Plan Review

Personnel Position/Department: Public Works

BMP Description :

Review erosion control plans to ensure compliance with storm-water practices.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Review all plans and record number of erosion control plans reviewed.

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

All development plans received by Community Development are reviewed for grading and drainage requirements including stormwater protection. In most instances, each set of plans has a separate SWPP document, but sometimes they are included in the grading plan. The City has instituted a requirement for individual developments of one acre or greater to obtain an NOI from ADEQ directly and requires this submittal to be approved by ADEQ prior to the issuance of a building permit.

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Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City will continue to require that SWPP documents be submitted with all development plans and will also require that all developments on 1 acre or more submit for an individual NOI from ADEQ.

Question: For Minimum Control Measure 4: Construction Activity Stormwater Runoff Control, Did the program implement any additional BMPs during this reporting period?

Answer:

Did the program implement any additional BMPs during this reporting period? No

Provide a summary of compliance with the requirements for Minimum Control Measure4.

Trash collection at the Public Works yard has been found to be a bit more difficult than it has been previously. During this reporting period, the City transferred operations of the Transfer Station to a private entity and they have had some issues keeping all trash onsite on windy days. The City has notified the operator of the issue and they are being more vigilant, but there are still times when the materials get away.

Question: Were any construction activity operator training events conducted?

Answer:

Yes

Sr.No.	Date of Training Event	Training Subject	Number of Employees Trained	Frequency of Training
1	12/18/2018	Stormwater Inspector Training	3	One time event

Question: Minimum Control Measure 4: Construction Activity Stormwater Runoff Control, Provide the details of the construction activity complaints and inspections that were conducted during this reporting period.

Answer:

Number of active construction sites in this reporting period: 10

Has an inspection frequency been developed and implemented? YES

Number of active construction sites inspected at least weekly: 7

Number of active construction sites inspected at least one time every six months: 10

Number of active construction sites inspected at least monthly: 10

Number of active construction sites inspected at least annually: 10

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Number of construction activity complaints that were resolved or responded to: 2

Number of active construction sites that required re-inspections in this reporting period: 10

Number of active construction sites not inspected: 0

Number of construction activity complaints received in this reporting period: 0

Sr.No.	Enforcement Actions	Enforcements Issued	Enforcements Resolved	Enforcements Unresolved
1	NOV	2	2	0
2	NOC	0	0	0
3	Stop Work	0	0	0
4	Admin Order	0	0	0
5	Admin Fines	0	0	0
6	Civil Penalties	0	0	0
7	Criminal Action	0	0	0
	Total	2	2	0

Question: For each BMP in the Minimum Control Measure 5: Post-Construction Stormwater Management in New Development and Redevelopment, what was completed during this reporting period?

Answer:

BMP Name: 5-2 Enforcement Procedures

Category: Enforcement

Personnel Position/Department: Public Works

BMP Description :

Follow ERP for all post-construction BMPs not in compliance.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Record all enforcement actions and outcome each year.

Were milestones/measurable goals achieved for this reporting period? No

ADEQ Directed No

Change:

Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.

The City Attorney is currently reviewing a DRAFT of a Stormwater Enforcement Ordinance that will be taken to council during the next reporting period for action and adoption.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

During the next reporting period, the staff is hopeful to have a new Stormwater Enforcement Ordinance in-place to provide the necessary tooth for local enforcement of the program.

BMP Name: 5-3 Site Plan Review Procedures

Category: Site Plan Reviews

Personnel Position/Department: Public Works

BMP Description :

Implement SOPs for permanent stormwater BMP design, construction oversight and as-built verification. Review plans for compliance with regulations and SOP.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Document plans reviewed per reporting period.

Were milestones/measurable goals achieved for this reporting period? No

ADEQ Directed No

Change:

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Provide a description of the reason(s) why milestones were not met and include measures that will be implemented to get back on schedule.

The City has not completed a written SOP detailing how this item will be handled.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City will develop a written SOP detailing the implementation of this BMP.

BMP Name: 5-5 Structural/Non-Structural BMP

Category: Structural/Non-Structural BMP

Personnel Position/Department: Public Works

BMP Description :

Structural/Non-Structural BMP: Use of berms and other natural barriers to prevent stormwater runoff.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Structural/Non-Structural BMP: Implement appropriate berthing to prevent runoff from the site.

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City has implemented berms in the past to control runoff. These berms continue to function but on occasion need maintenance and repair. City staff conducts annual maintenance on these facilities.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

City staff will continue to maintain berms for runoff control to aide in complying with the MS4 permit requirements.

BMP Name: 5-1 Stormwater Control Inventory and Inspection

Category: Inventory

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Personnel Position/Department: Public Works

BMP Description :

Develop and maintain a GIS database of permanent stormwater BMPs and ensure permanent stormwater BMPs are maintained by private property owners.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Update database as new BMPs are completed. Report number of additions to database each year.

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City's Stormwater inventory mapping is complete. Staff routinely interacts with private property owners that believe all washes are the City's responsibility and we try to educate the landowners that this is not always the case. With sufficient explanation, we are usually able to get the point across, but sometimes it is very difficult to change public perception.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The City will continue to operate this portion of the program as it has during the next reporting period.

BMP Name: 5-4 Operations and Maintenance of Post-Construction BMPs

Category: O&M Procedures

Personnel Position/Department: Public Works

BMP Description :

Require private developments to maintain their structural BMPs. City shall inspect public post-construction BMPs using the Post-Construction Inspection Form.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 10/01/2017

Targeted End Date: 06/30/2019

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Frequency: 1 Annually

Milestone Description:

City shall inspect 20% of post-construction BMPs at public facilities each year and respond to all complaints at private facilities.

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

Inspecting City facilities is the easier portion of this measure. The real difficulty comes on the private side. We have not received any complaints through the stormwater hotline to respond to.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

City staff is hopeful that the new stormwater awareness campaign will increase the amount of feedback we receive from the public to aide the City in improving stormwater quality within its jurisdiction.

Question: For Minimum Control Measure 5: Post-Construction Stormwater Management in New Development and Redevelopment, Did the program implement any additional BMPs during this reporting period?

Answer:

Did the program implement any additional BMPs during this reporting period? No

Provide a summary of compliance with the requirements for Minimum Control Measure 5.

Staff believes that the implementation of a Stormwater Enforcement Ordinance will help make its duties under this program easier to enforce as well as provide greater awareness to the residents that the City is supportive of being a good steward of nature.

Question: Minimum Control Measure 5: Post-Construction Stormwater Management in New Development and Redevelopment, Provide the details of the Post-Construction Stormwater controls used during this reporting period

Answer:

Number of sites that required Post-Construction Stormwater controls in this reporting period: 4

Number of Post-Construction Stormwater controls inspected in this reporting period: 4

Sr.No.	Enforcement Actions	Enforcements Issued	Enforcements Resolved	Enforcements Unresolved
--------	---------------------	---------------------	-----------------------	-------------------------

1	NOV	0	0	0
2	NOC	0	0	0
3	Stop Work	0	0	0
4	Admin Order	0	0	0
5	Admin Fines	0	0	0
6	Civil Penalties	0	0	0
7	Criminal Action	0	0	0
	Total	0	0	0

Question: For each BMP in the Minimum Control Measure 6: Pollution Prevention and Good Housekeeping, what was completed during this reporting period?

Answer:

BMP Name: Maintenance Activities

Category: Maintenance Activities

Facility Information:

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

Personnel Position/Department: Public Works

BMP Description :

Routine trash collection. Staff will conduct weekly rounds at the Public Works Yard to cleanup trash found onsite.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Weekly

Milestone Description:

Remove miscellaneous trash that blows onto the Public Works Yard.

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Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 06/15/2019

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

Staff is currently conducting monthly trash collection because the weekly frequency seemed to be too often.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

Staff will continue to conduct monthly trash collection onsite and if needed will increase the frequency to ensure that trash does not buildup onsite.

BMP Name: Inventory

Category: Inventory

Facility Information:

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

Personnel Position/Department: Public Works

BMP Description :

Inventory

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Inventory

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

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The City continues to routinely review the BMPs employed at the facilities listed above.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

The city will continue to monitor the BMPs employed at the facilities listed above.

BMP Name: Maintenance Schedule

Category: Maintenance Schedule

Facility Information:

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

Personnel Position/Department: Public Works

BMP Description :

Conduct a visual inspection after each rainfall event (a minimum of 1 time per year) to identify any points of erosion or concentrated flow leaving the site.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Repair the eroded area and look upstream to identify the cause and implement a remedy (e.g. straw wattles, berms, etc.)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City's inspection staff has been directed to visually check the facilities listed above after every rainfall event as well as all of the major washes within the City.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

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Milestone Description:

This routine monitoring is working well and will continue as established.

BMP Name: 6-2 O&M Procedures

Category: O&M Procedures

Facility Information:

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

Personnel Position/Department: Public Works

BMP Description :

- A. Street Sweeping Program
- B. Vehicle Maintenance and Washing

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Monthly

Milestone Description:

- A. Continue street sweeping program; record miles swept and tons of debris removed.
- B. Perform maintenance on City vehicles as-needed at local repair shops and wash vehicles at wash bay as-needed.

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The City has one street sweeper and it was down for a couple of months because it was rear-ended while conducting street sweeping activities in early 2019. The sweeping for this reporting period resulted in 102.27 tons of material being kept out of the City's storm drain system. City staff had begun changing the oil on its fleet during this reporting period. All activities associated with oil changes are conducted inside the garage which has a trench drain the leads to a sand/oil/water separation device. City vehicles that are washed onsite are washed in the designated wash bay.

Provide a summary of activities planned for next reporting period

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BMP does not apply for next reporting period:

No

Milestone Description:

Staff will continue to conduct these operations into the next reporting period.

BMP Name: 6-4 Staff Training

Category: Training

Facility Information:

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

Personnel Position/Department: Public Works

BMP Description :

Yearly training for City staff on stormwater pollution prevention.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

Record number of employees who received stormwater training. (Annual training.)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 12/18/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

A renewed focus on training has been implemented. As of the next reporting period, a monthly training session will be implemented for pertinent staff.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

Staff training has been increased to monthly so that there is a constant reminder of the importance of this program.

BMP Name: 6-3 Implement Pollution Controls

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Category: Implement Pollution Controls

Facility Information:

Public Works Yard
Airport
Mingus WWTP
Riverfront WRF

Personnel Position/Department: Public Works

BMP Description :

- A. Maintain structural controls installed on municipal facilities.
- B. Review pollution prevention plans for municipal facilities.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 07/01/2018

Targeted End Date: 06/30/2019

Frequency: 1 Annually

Milestone Description:

- A. Inspect and maintain structural controls and document inspections. (Annually)
- B. Review and update pollution prevention plans as necessary. (Annually.)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start Date: 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

The routine inspection and maintenance of structural controls can be a challenge at times. The City finds that working within the right of way is perceived by the to be the responsibilities of the Public Works crew. We generally focus our repair efforts on areas that are regularly seen by the public and sometimes the facility becomes neglected. By implementing the monthly inspection program for the Public Works yard, we are hopeful that site maintenance will be kept at the forefront of our minds and that the maintenance will be conducted more frequently. If this proves to be successful, we will look to implement this for other City facilities.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

Milestone Description:

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Staff will continue to monitor these facilities and assess if the monthly inspection program is having an impact. If an impact is noticed, staff will look to expand the monthly inspection program to other City facilities.

BMP Name: 6-1 Inspect Municipal Facilities

Category: Inspections

Facility Information:

Public Works Yard

Airport

Mingus WWTP

Riverfront WRF

Personnel Position/Department: Utilities Department

BMP Description :

Develop an inspection schedule for municipal facilities based on potential discharge priority.

Is another government entity responsible for this BMP ? No

Measurable Goals:

Start Date: 10/01/2017

Targeted End Date: 06/30/2019

Frequency: 1 Quarterly

Milestone Description:

A. Inspect facilities based upon prioritization.

B. Document inspection findings annually.

(Low priority: 20% per year

Med priority: Annually

High priority: Quarterly)

Were milestones/measurable goals achieved for this reporting period? Yes

Actual BMP Start 07/01/2018

Date:

Provide a description of BMP effectiveness, including metrics used to determine effectiveness.

Staff conducts periodic inspections of its facilities. With the increased policing of trash collection and monitoring of other SWPP countermeasures, the staff is more aware of what areas need attention so things can be addressed before a rainfall event.

Provide a summary of activities planned for next reporting period

BMP does not apply for next reporting period: No

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Milestone Description:

Staff will continue to conduct periodic inspections.

Question: For Minimum Control Measure 6: Pollution Prevention and Good Housekeeping, Did the program implement any additional BMPs during this reporting period?

Answer:

Did the program implement any additional BMPs during this reporting period? No

Provide a summary of compliance with the requirements for Minimum Control Measure 6.

The self-policing efforts are the easiest to implement but sometimes get put off. We have tried to implement new monitoring frequencies to increase the awareness level of all Public Works staff in hopes that they pay more attention to stormwater runoff.

Question: Was staff training conducted?

Answer:

Yes

Sr.No.	Date of Training Event	Training Subject	Number of Employees Trained	Frequency of Training
1	12/18/2018	Stormwater Inspector Training	3	One time event

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ROBERT LWINIECKE

You validated your identity by answering your personal security question and password on myDEQ at **08:34 AM** on **09/30/2019**. At this time, you certified the summary information above by checking that you agreed to the following statement:

Certify your submission:

By checking this box I certify under penalty of law that this submittal was prepared by me, or under my direction or supervision of personnel appropriately qualified to properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I understand that all information submitted to ADEQ is public record unless otherwise identified by law as confidential. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

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